

## NRR-PMDAPEm Resource

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**From:** Buckberg, Perry  
**Sent:** Monday, December 14, 2015 2:51 PM  
**To:** 'Frehafer, Ken'  
**Cc:** Saba, Farideh; 'Cross, William'; Klett, Audrey; 'Katzman, Eric'  
**Subject:** St. Lucie RAI - Fuel Oil Storage Tank Sediment Cleaning - MF6488/MF6489  
**Attachments:** RAI-MF6488 MF6489-SBPB-1 12-14-15.pdf

Ken,

By License Amendment Request dated July 14, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15198A032), Florida Power & Light Company (the licensee) submitted a request to remove Technical Specifications (TS) Limiting Condition for Operation (LCO) 4.8.1.1.2.g (fuel oil storage tank sediment cleaning and pressure testing) and relocate the TS requirements to the Updated Final Safety Analysis Report.

The U.S. Nuclear Regulatory Commission Staff reviewed the submittal and identified areas where it needs additional information and clarification to complete its review. The Request for Additional Information (RAI) is provided below. The NRC requests that the licensee respond to this RAI within 45 days of this email.

Thanks,

**Perry Buckberg**

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**Received Date:** 12/14/2015 2:51:00 PM  
**From:** Buckberg, Perry

**Created By:** Perry.Buckberg@nrc.gov

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"Saba, Farideh" <Farideh.Saba@nrc.gov>  
Tracking Status: None  
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**Post Office:**

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**Options**

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**Return Notification:** No  
**Reply Requested:** No  
**Sensitivity:** Normal  
**Expiration Date:**  
**Recipients Received:**

**REQUEST FOR ADDITIONAL INFORMATION**  
**ST. LUCIE, UNIT 1 AND 2 (DOCKETS 50-335 AND 50-389)**  
**LICENSE AMENDMENT REQUEST FOR TECHNICAL SPECIFICATION CHANGE**  
**TO REMOVE THE 10 YEAR SEDIMENT CLEANING OF THE FUEL OIL STORAGE TANK AND**  
**RELOCATE TO LICENSEE-CONTROLLED DOCUMENTS**  
**(MF6488 & MF6489)**

**RAI-MF6488/MF6489-SBPB-01**

**BACKGROUND:**

As required by 10 CFR 50.36(c)(3), Surveillance Requirement (SR) are the requirements related to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the Limiting Condition for Operations (LCOs) will be met.

In the subject St. Lucie License Amendment Request (LAR), the current Technical Specification (TS) SR 4.8.1.1.2.g for Unit 2 reads as follows:

g. At least once per ten years by:

1. Draining each fuel oil storage tank, removing the accumulated sediment and cleaning the tank using a sodium hypochlorite solution, and,
2. Performing a pressure test of those portions of the diesel fuel oil system designed to Section III, subsection ND of the American Society of Mechanical Engineers (ASME) Code in accordance with the Inservice Inspection Program.

It should be noted that this LAR also proposed changes to the Unit 1 SR requirements, but the current Unit 1 SRs differ slightly from the current Unit 2 SRs.

**ISSUE:**

Although the LAR includes discussion of the cleaning requirement portion of SR, the SR 4.8.1.1.2.g.2 contains pressure testing requirement for portions of the fuel oil system, which was not addressed in Technical Specification Task Force-2, nor included in the other precedent plants TSs referenced in LAR. The staff is unable to locate any discussion or basis for removal/relocation of this fuel oil system pressure testing SR.

**RAI:**

Please explain the rationale behind the removal of the pressure tests of those portions of the diesel fuel oil system designed to Section III, subsection ND of the ASME Code for each unit. Include the following in your explanation:

1. Describe how the diesel fuel oil system is classified as an ASME Code Class 3 system, as specified in current TSs.

2. Verify that TS 4.0.5 contains the equivalent SR for inservice inspection and testing of ASME Code Class 1, 2, and 3 components and is applicable to the pressure testing of the diesel fuel oil system.
3. Explain how the regulations at 10 CFR 50.36 (c)(2) and 10 CFR 50.36 (c)(3) will continue to be met for LCO 3.8.1 after the removal of the pressure tests
4. Provide a description of the location where a commitment to a 10-year surveillance frequency for pressure testing of the fuel oil system will be maintained.